


<b>INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT</b>	<b>STATUS:</b> Pending	<b>POLICY NUMBER:</b> 08-006-NPD	
<b>AGENCY NONRULE POLICY DOCUMENT</b>  <b>SUBJECT:</b>  Compliance and Enforcement Response Policy	<b>AUTHORIZED:</b> Thomas W. Easterly, Commissioner		
	<b>SUPERSEDES:</b> Classification of Environmental Violations and Criteria For Referral of Such Violations to the Office of Enforcement dated February 5, 2003	<b>ISSUING OFFICE(S):</b> Office of Enforcement Office of Air Quality Office of Land Quality Office of Water Quality	
	<b>ORIGINALLY EFFECTIVE:</b> February 5, 2003	<b>RENEWED/REVISED:</b> October 31, 2008	

*Disclaimer: This Nonrule Policy Document (NPD) is intended solely as guidance and does not have the effect of law or represent formal Indiana Department of Environmental Management (IDEM) decisions or final actions. This nonrule policy document shall be used in conjunction with applicable laws. It does not replace applicable laws, and if it conflicts with these laws, the laws shall control. This nonrule policy document may be put into effect by IDEM thirty (30) days after presentation to the appropriate State Environmental Board. Pursuant to IC 13-14-1-11.5, this policy will be available for public inspection for at least forty-five (45) days prior to presentation to the appropriate board. If the nonrule policy is presented to more than one State Environmental Board, it will be effective thirty (30) days after presentation to the last. IDEM will submit the policy to the Indiana Register for publication. Revisions to the policy will follow the same procedure of presentation to the State Environmental Board and publication.*

## 1.0 PURPOSE

The purpose of the Indiana Department of Environmental Management ("IDEM") Compliance and Enforcement Response Policy (the "CERP" or "Policy") is to set forth IDEM's clear and consistent policy on the appropriate and timely identification and enforcement of Violations by Regulated Entities subject to Indiana's Environmental Requirements.

## 2.0 SCOPE

This Policy applies to all Agency staff involved in the identification and enforcement of Violations by Regulated Entities subject to Indiana's Environmental Requirements. This Policy shall apply from the date of discovery of the Violation (whether discovery is through an inspection, record review, or any other compliance determination method) through the conclusion of any administrative enforcement action. This Policy does not apply to violations lead by EPA, referred directly to the Office of Attorney General (ATG) or those investigated by or referred to the Office of Criminal Investigations (OCI).

This Policy sets forth factors for IDEM consideration that shall guide IDEM in the exercise of its compliance and enforcement discretion. IDEM reserves the right to take appropriate enforcement action on any Regulated Entity as deemed necessary specific to that case.

## 3.0 SUMMARY

The CERP sets forth IDEM's systematic approach to the identification and enforcement of Violations by Regulated Entities subject to Indiana's Environmental Requirements. The CERP focuses on both the appropriateness and timeliness of IDEM's compliance and enforcement activities.

The CERP articulates the appropriateness of the particular enforcement response provided when one or more Violations are identified. In addition, the CERP sets forth specific timeframes for the notification of a Regulated Entity of Violations and appropriate administrative enforcement of such Violations by the Office of Air Quality (OAQ), Office of Land Quality (OLQ), the Office of Water Quality (OWQ), or Office of Enforcement (OE).

#### **4.0 DEFINITIONS**

- 4.1 "Agency Enforcement Response" – An IDEM action including but not limited to the following: issuance of a Violation Letter or Notice of Violation, adoption of an Agreed Order, and issuance of a Commissioner's Order.
- 4.2 "Assistant Commissioner" – A senior management level position appointed by the Commissioner.
- 4.3 "Branch Chief" – A secondary management level position in IDEM.
- 4.4 "Case Manager" - The person(s) assigned by the Enforcement Section Chief to a particular enforcement case.
- 4.5 "Commissioner's Order" – An administrative proceeding under IC 13-30-3-10 for violations of an Indiana Environmental Requirement.
- 4.6 "Complaint" – For purposes of this non-rule policy document is a concern filed by any entity (citizen, public official, etc.) alleging polluting activities.
- 4.7 "Compliance Cases" – Allegations of non-compliance at a Regulated Entity referred to compliance branch management for consideration of enforcement action.
- 4.8 "Compliance Manager" – Includes Branch Chiefs and Section Chiefs within the Offices of Air Quality, Land Quality, and Water Quality, and the Deputy Directors within the Regional Offices.
- 4.9 "Compliance Program" – The areas of IDEM tasked with determining and documenting whether a regulated entity is complying with Indiana's Environmental Requirements.
- 4.10 "Compliance Review" – The use of techniques other than inspections to evaluate a Regulated Entity's compliance with Indiana's Environmental Requirements or other applicable pollution control limit. These techniques include, but are not limited to the review of self-reporting or records supplied by the Regulated Entity, analysis of information, data, or samples, off-site observations or surveillance, and review of maps, photos, video, digital images, or other information.
- 4.11 "Compliance staff" - Employees assigned to conduct regulatory compliance reviews, on-site inspections, or investigations on behalf of IDEM.
- 4.12 "Compliance and Technical Assistance Program (CTAP)" – A program within the Office of Pollution Prevention and Technical Assistance providing confidential compliance and technical assistance to communities and businesses.
- 4.13 "Enforcement Action" – The issuance of either a Violation Letter issued by an IDEM Program Area or Referral to the Office of Enforcement (OE), Attorney General or EPA for a Violation. Enforcement actions may result in either an informal action or formal agency enforcement response by IDEM.
- 4.14 "Enforcement staff" – An Enforcement Section Chief or Case Manager assigned by the Enforcement Section Chief, to a particular enforcement case.
- 4.10 "Findings" – The outcome of a compliance inspection, investigation or compliance review.
- 4.11 "Indiana Environmental Requirement" - Includes, but is not limited to, any (1) requirement prescribed by Title 13 of the Indiana Code; (2) rule adopted by the Air Pollution Control Board, Solid Waste Management Board, Water Pollution Control Board, and/or the Financial Assurance Board; (3) term or condition within a permit, license, registration or certification; or (4) requirement contained within a judicial order or final administrative order.

- 4.12 "Inspection" – An on-site evaluation of a Regulated Entity's compliance with an Indiana Environmental Requirement.
- 4.13 "Inspection Notification" – A written summary of the oral report provided to a Regulated Entity at the conclusion of an Inspection pursuant to Ind. Code § 13-14-5-3.
- 4.14 "Multi-media" – An environmental compliance determination of Violations from at least two different environmental Program Areas, such as air and land (e.g., open burning and open dumping).
- 4.15 "Notice of Violation" – Notification to a Regulated Entity of an administrative proceeding under IC 13-30-3-3 for violations of an Indiana Environmental Requirement.
- 4.16 "Program Area" - These include, but are not limited to, the following departments: Office of Air Quality, Office of Land Quality, and Office of Water Quality.
- 4.17 "Referral" - Correspondence from Compliance Program to the Office of Enforcement, U.S. EPA or the Office of the Indiana Attorney General regarding a Violation of an Indiana Environmental Requirement for an appropriate Enforcement Response.
- 4.18 "Regional Office Deputy Director" – A first level Agency supervisor within one of the Regional Offices in IDEM.
- 4.19 "Regional Office Director" – A management level position appointed by the Commissioner to one of the three Regional Offices of IDEM.
- 4.20 "Regional Office staff" - Agency staff assigned to conduct regulatory compliance reviews, on-site inspections and investigations on behalf of IDEM located in one of the three Regional Offices.
- 4.21 "Regulated Entity" – Any entity subject to one or more IDEM administered statutes and rules.
- 4.22 "Response" – A reply to a Violation Letter describing the compliance actions taken to correct a Violation.
- 4.23 "Section Chief" - A first level Agency supervisor in the Office of Enforcement, Office of Air Quality, Office of Land Quality, or Office of Water Quality compliance programs.
- 4.24 "State Agency" – As used in this document, state agency means a state office, officer, department, division, bureau, board, or commission, or any other state body or agency.
- 4.25 "Violation" – Any non-compliance with Indiana's Environmental Requirements.
- 4.26 "Violation Letter" - Correspondence from compliance program or OE to a Regulated Entity regarding a Violation of an Indiana Environmental Requirement or other applicable pollution control limits. This correspondence may require a Response from the Regulated Entity that describes what action will be taken to achieve and maintain compliance.

## 5.0 ROLES

This Policy shall be implemented by IDEM Compliance and OE Staff and shall be enforced by the appropriate Compliance Managers, and OE Branch and Section Chiefs. The Commissioner, Assistant Commissioners, Compliance Branch Chiefs, and OE Branch Chief possess the discretion to authorize Compliance or Enforcement Staff to deviate from the terms of this Policy on a case-by-case basis.

- 5.1. The Compliance staff shall:
  - 5.1.1. Identify Violations through compliance reviews, on-site inspections, and investigations on behalf of IDEM;
  - 5.1.2. Identify the appropriate class of Violation consistent with this policy;
  - 5.1.3. Take appropriate enforcement action within the designated timeframe;
  - 5.1.4. Route the Inspection Summary/Violation Letter or Referral to the appropriate Section Chief or Deputy Director within the designated timeframe;
  - 5.1.5. Coordinate with OE per this policy and Section 6.

- 5.2. The Compliance Program Section Chief supervising compliance staff shall:
  - 5.2.1. Ensure appropriate class of Violation is consistent with this policy;
  - 5.2.2. Monitor and ensure deadlines are met;
  - 5.2.3. Sign all Inspection Summary/Violations Letters or Referrals and send within designated timeframes;
  - 5.2.4. Sign off on all Referrals to the OE and route to appropriate Branch Chief;
  - 5.2.5. Coordinate with OE per this policy and Section 6.
- 5.3. The Compliance Program Branch Chief shall:
  - 5.3.1. Review referrals;
  - 5.3.2. Identify any sensitive issues;
  - 5.3.3. Appropriately coordinate with Regional Office Directors or Deputy Directors;
  - 5.3.4. Ensure appropriate class of Violation is consistent with this policy;
  - 5.3.5. Monitor and ensure deadlines are met;
  - 5.3.6. Sign off on all Referrals to Enforcement and route to their Program AC;
  - 5.3.7. Be the point of contact for each Program Area;
  - 5.3.8. Coordinate with OE per this policy and Section 6;
  - 5.3.9. Identify revisions to this policy.
- 5.4. The Office of Enforcement Branch Chief shall:
  - 5.4.1. Ensure appropriate enforcement actions are taken consistent with this policy;
  - 5.4.2. Ensure potentially sensitive issues are brought to the attention of the Assistant Commissioner for the Office of Legal Counsel;
  - 5.4.3. Monitor and ensure deadlines are met;
  - 5.4.4. Be the point of contact for the Office of Enforcement;
  - 5.4.5. Coordinate with IDEM Program Areas per this policy and Section 6;
  - 5.4.6. Identify revisions to this policy.
- 5.5. The Enforcement Section Chief shall:
  - 5.5.1. Review referrals;
  - 5.5.2. Identify any sensitive issues;
  - 5.5.3. Sign off on all Referrals sent to the OE;
  - 5.5.4. Assign to appropriate Case Manager;
  - 5.5.5. Monitor and ensure deadlines are met in accordance with employee performance plans;
  - 5.5.6. Coordinate with the Compliance Programs per this policy and Section 6.
- 5.6. The Enforcement Case Manager shall:
  - 5.6.1. Evaluate documentation to ensure referral supports enforcement action
  - 5.6.2. Prepare all documents and manage all assigned cases to assure deadlines are met;
  - 5.6.3. Enter required enforcement information into the METS database;
  - 5.6.4. Coordinate with the Compliance Programs per this policy and Section 6.
- 5.7. The Assistant Commissioners shall:
  - 5.7.1. Distribute this policy and accompanying standard operating procedures to all Compliance and Enforcement;
  - 5.7.2. Review all referrals to the Office of Enforcement to ensure Violations are managed in accordance with the provisions of this policy and Section 6;
  - 5.7.3. Ensure any program-specific policies are consistent with this policy;
  - 5.7.4. Coordinate with the other Assistant Commissioners, Compliance Branch Chiefs, and Regional Office Directors, as necessary;
  - 5.7.5. Establish a process to evaluate compliance cases to assure case-specific circumstances justify the level of enforcement proposed;
  - 5.7.6. Review all proposed denials of Voluntary Self-Disclosures to ensure self-disclosures are managed appropriately;
  - 5.7.7. Notify the Commissioner of a program referral of a state facility;
  - 5.7.8. As directed by the Commissioner, hold discussions with counterparts at appropriate state agency concerning compliance problems to ensure that the appropriate state agency takes actions to return to compliance;
  - 5.7.9. Determine, after discussion with appropriate state agency, whether to refer a case

- regarding state agency compliance to the Office of Enforcement;
- 5.7.10. Forward, when appropriate, referral packet of a state facility to the Assistant Commissioner of the Office of Legal Counsel for appropriate enforcement action.

## 6.0 POLICY

- 6.1. Violations of Indiana's Environmental Requirements shall be fully documented in writing by Compliance staff consistent with the standard operating procedures for their appropriate program. Should a violation be encountered that is not included in program specific operating procedures, the Compliance Program, in consultation with the appropriate Program Assistant Commissioner, shall make a determination of the approach to handle the violation. IDEM reserves the right to take the appropriate enforcement action on any Regulated Entity as deemed necessary specific to that case.

### 6.2. Classes of Violations:

Violations have been divided into three classes. In all three classes, violations will be referred to OE when approved by the applicable Program Assistant Commissioner. By setting these Agency-wide standards, it is expected that Agency staff will make determinations that are consistent and fair across all media.

#### 6.2.1. General categories:

##### 6.2.1.1. Class 1 Violations:

- A. Violations which are immediately reviewed by the appropriate Program Assistant Commissioner for referral to OE;
- B. Unauthorized preventable (negligent) discharge, failure to provide treatment, release, or emission that result in actual threat to human health or safety or which results in a serious actual impact to the environment;
- C. Individual performing a regulated activity without the proper permit, license or certification that results in a significant threat to human health or the environment;
- D. A determination of significant noncompliance (SNC) or high priority violation (HPV), under the water, air, or hazardous waste programs (with specific exceptions described below);
- E. Documented falsification of data, documents, or reports;
- F. Failure to respond to a Violation Letter where a response is required;
- G. Denial of access to an IDEM staff person to a regulated site;
- H. Other preventable violations not specifically identified above which result in actual threat to human health or safety or which results in serious actual impact to the environment.

##### 6.2.1.2. Class 2 Violations:

Violations referred to OE if not adequately addressed by the Regulated Entity after a violation letter/ request for information letter is sent and the violation was not corrected or the Response not deemed appropriate by the respective Program Assistant Commissioner:

- A. Unauthorized discharge, failure to provide treatment, release or emission , or threat of release or emission, that results in minor or potential risk to human health or no serious harm to the environment;
- B. Individual performing a regulated activity without the proper permit, license or certification that does not result in a significant threat to human health or the environment;
- C. Individual performing a regulated activity with the proper permit, license or certification, but not following all required practices, with the exception of asbestos work practice requirements;
- D. Late, incomplete, or improperly completed data, documents, reports or compliance monitoring and assurance activities.

6.2.1.3. Class 3 Violations:

Chronic or recurring minor violations. (May be referred to OE after repeated documentation of the violation or efforts to achieve compliance fail and the violation continues):

- A. Violations not otherwise covered by Class I or II, which are minor in nature and are documented in inspection reports or similar reports. These are often corrected at the time of the inspection, but recur after having been corrected. If there are recurring violations, a referral to OE may occur after a Violation Letter is sent;
- B. Violations that meet the criteria set forth in IC 13-30-7 as "minor violations."

6.3. Disclosures:

6.3.1. Mandatory disclosures submitted to IDEM by Regulated Entities:

6.3.1.1. Appropriateness:

Regulated Entities that are required to disclose Violations (e.g., quarterly deviation reports, discharge monitoring reports, annual compliance certifications) shall be treated in the same manner as if the Violation was discovered by IDEM.

6.3.2. Voluntary self-disclosures submitted to IDEM by Regulated Entities:

6.3.2.1. Appropriateness:

The OE shall evaluate any Self-Disclosure within the parameters of IDEM's *Self-Disclosure & Environmental Audit Policy* and any related Standard Operating Procedures.

6.3.2.2. Approval:

The OE shall approve or disapprove any Self-Disclosure. All proposed disapprovals shall be reviewed by the Assistant Commissioner for the Office of Legal Counsel and respective Program Assistant Commissioner for appropriateness.

6.4. Compliance Programs:

Compliance Programs shall take an appropriate and timely Enforcement Action for all Violations. Violations shall be documented in writing, and the Regulated Entity shall be notified of all Violations and appropriate Enforcement Action. Notification to the Regulated Entity shall be consistent with the agency's policies relative to providing notice of inspection results. The Commissioner, Assistant Commissioners, and Compliance Branch Chiefs possess the discretion to authorize Compliance staff to deviate from the terms of this Policy on a case-by-case basis.

6.4.1. Appropriateness:

Whenever appropriate, the Compliance Manager shall seek to issue to a Regulated Entity the most informal enforcement action available in an effort to promote the expeditious return to compliance by that Regulated Entity.

Consistent with any standard operating procedures relative to determining appropriate enforcement actions for program specific violations, and/or other procedures in effect, Compliance Managers shall identify an appropriate enforcement action for each Violation for purposes of implementing an appropriate enforcement action.

Class I Violations require immediate referral to the Program Assistant Commissioner for consideration of referral to OE, regardless of the efforts by the responsible party or IDEM staff to achieve compliance. If the violator is responsible for a number of violations, which include a mixture of Class I, II, and III violations, all violations will be referred with the Class I Violations.

Class II Violations require referral to the Program Assistant Commissioner for consideration of referral to OE, following the issuance of a Violation Letter, when the violation is not corrected within the timeframe required by the Violation Letter or if the Violation occurs a second time.

Class III Violations may be referred to the Program Assistant Commissioner for consideration of referral to OE when the responsible party has been found to be repeatedly in violation of the same minor requirement, i.e., responsible party has received written notification three times in the past five years for the same violation.

IDEM shall consider litigation to be anticipated with the Regulated Entity and shall comply with the agency's policy relative to maintaining information concerning facilities in litigation, no later than the date upon which a referral of a Compliance Inspection Report is made to the OE.

Consistent with Ind. Code § 13-14-5 et seq. Compliance staff shall provide a verbal summary to the Regulated Entity, if the Regulated Entity is available, at the conclusion of an Inspection.

Compliance staff shall provide a written Inspection Notification to the Regulated Entity of the on-site inspection or investigation detailing any specific matters discovered during the inspection or investigation that may constitute a Violation of Indiana's Environmental Requirements.

Compliance staff shall provide, in writing, to the Regulated Entity, notice that a Violation has been referred to the OE at the time the referral is sent to OE if the referral is deemed appropriate by the program Assistant Commissioner.

#### 6.4.1.1. Class I Violations:

Compliance staff shall submit a referral to the Program Assistant Commissioner for consideration of referral to OE, detailing any specific Violations upon conclusion of a regulatory Compliance Review, on-site inspection, or investigation and determination of a Violation.

#### 6.4.1.2. Class II Violations:

Compliance Programs shall issue Violation Letters for Class II Violations. Compliance staff and Managers shall ensure that a Violation Letter is issued to a Regulated Entity upon the conclusion of an inspection or compliance review or investigation and determination of a Violation.

Compliance staff and Managers shall ensure that the Regulated Entity has achieved compliance with the provisions of the Violation Letter.

In the event that compliance with the provisions of a Violation Letter is not achieved, the Compliance staff and Manager shall ensure that the Violations cited in the Violation Letter are referred to the Program Assistant Commissioner for consideration of referral to OE.

If an Enforcement Follow-up Inspection (EFI) is necessary to verify compliance with the Violation Letter, Compliance staff and Managers shall ensure that the EFI is conducted.

#### 6.4.1.3. Class III Violations:

Compliance Programs shall issue Violation Letters for Class III Violations. Compliance staff and Managers shall ensure that a Violation Letter is issued to a Regulated Entity upon conclusion of an inspection or compliance review and determination of a Violation.

In the event of repeated violations of the same minor requirement, i.e., responsible party has received written notification three times in the past five years for the same violation, the Compliance staff and Manager shall ensure that

the Violations cited in the previous Violation Letters are referred to the Program Assistant Commissioner for consideration of referral to OE.

If an Enforcement Follow-up Inspection (EFI) is necessary to verify compliance with the Violation Letter, Compliance staff and Managers shall ensure that the EFI is conducted.

6.5. Enforcement Program:

Enforcement staff shall take an appropriate and timely Enforcement Action for all Violations referred to the OE. The Commissioner, Assistant Commissioners, and OE Branch Chief shall possess the discretion to authorize Enforcement staff to deviate from the terms of this Policy on a case-by-case basis.

6.5.1. Violation Letter:

An Enforcement Case Manager shall ensure that a Violation Letter is sent to the Enforcement Section Chief.

If an EFI is necessary to verify compliance with the Violation Letter, a Case Manager shall request the EFI.

A Case Manager shall ensure that compliance with the provisions of the Violation Letter has been achieved by the Regulated Entity.

In the event that compliance with the provisions of a Violation Letter is not achieved, the Case Manager shall ensure that a Notice of Violation is drafted and presented for review by the Enforcement Section Chief.

6.5.2. Notice of Violation:

6.5.2.1. No Request for Legal Assistance:

The Branch Chief of OE shall ensure that a Notice of Violation is issued to a Regulated Entity, unless waived by the Regulated Entity, in accordance with OE policies.

6.5.2.2. Request for Legal Assistance:

In the event that Enforcement Staff shall require the assistance of legal counsel, the Case Manager shall request legal representation in accordance with the Deputy Attorney Generals policies for requesting representation.

Upon receipt of legal counsel's advice, OE shall ensure that a Notice of Violation is issued to a Regulated Entity, unless waived by the Regulated Entity.

6.5.3. Commissioner's Order:

Assuming that (1) a Notice of Violation does not lead to the adoption of an Agreed Order; (2) a Notice of Dismissal is not issued to the Regulated Entity; or (3) some other appropriate enforcement response is not selected by IDEM, OE shall ensure that a Commissioner's Order is presented to the Commissioner for approval and signature.

Prior to submittal of a Commissioner's Order to the Commissioner for consideration the OE will assess the status of the Regulated Entity in accordance with the Office's policy relative to requesting a compliance review / inspection.

6.5.4. Other Enforcement Responses:

Other Enforcement Responses may include but are not limited to Expedited Enforcement, Emergency Orders, Cease & Desist Orders, referrals to the U.S. Environmental Protection Agency, or referrals to the Indiana Attorney General.

6.5.5. State Agency Facilities and Enforcement:

In the event that other State Agency facilities have violations that warrant referral to the Office of Enforcement, the appropriate compliance program shall prepare a



referral packet fully documenting in writing violations of Indiana's Environmental Requirements. The referral packet shall be routed to the Assistant Commissioner of the appropriate program area. The Assistant Commissioner shall notify senior staff at a senior staff meeting of the referral. Senior staff will determine which senior staff member shall contact their appropriate counterpart at the affected Agency. The Assistant Commissioner shall hold discussions with counterparts at appropriate state agency concerning compliance problems to ensure that the appropriate state agency takes actions to return to compliance. The Assistant Commissioner shall, after discussion with appropriate state agency, determine whether to refer a case regarding state agency compliance to the Office of Enforcement. In such a case the Assistant Commissioner shall forward the referral packet to the Assistant Commissioner of the Office of Legal Counsel for appropriate enforcement action.

6.6. Other IDEM Actions:

A. The following Violations shall be addressed as listed below:

1. All pollution spills and Violations of an emergency nature shall be immediately reported to the IDEM's Spill Line at (888) 233-7745;
2. Direct or indirect threats, intimidation, criminal mischief, battery, or other criminal or inappropriate behavior towards an employee during the course of addressing a Complaint shall be immediately reported per the procedures set forth in IDEM's policy relative to dealing with threats or intimidations while conducting job duties;
3. Violations Discovered by the Compliance and Technical Assistance Program shall be handled in accordance with appropriate policies relative to managing confidential information discovered under the Compliance and Technical Assistance Program.

6.7. Criminal Investigations:

Evidence or other information that indicates possible criminal activity shall be referred to the Office of Criminal Investigations consistent with the IDEM Office of Criminal Investigations standard operating procedure for use of investigative discretion.

6.8. Referral to Indiana Attorney General:

Evidence or other information that indicates clear and immediate danger to human health or the environment shall be referred to the Office of the Indiana Attorney General.


6.9. Referral to United States Environmental Protection Agency:

Only those cases known to be open and currently under investigation or consideration by U.S. EPA shall be referred after review by the OLC AC and respective program AC.

7.0 REFERENCES

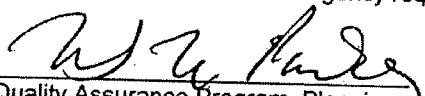
- 7.1. Self-Disclosure and Environmental Audit Policy, A-002-OE-06-P-R1

8.0 SIGNATURES

  
Thomas W. Easterly, Commissioner  
Indiana Department of Environmental Management

OCTOBER 31, 2008  
Date

This policy is consistent with Agency requirements.

  
Quality Assurance Program, Planning and Assessment  
Indiana Department of Environmental Management

NOVEMBER 5, 2008  
Date